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EX PARTE

Electronic Filing via ECFS

May 12, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TW B-204
Washington, DC 20554

RE: *IP-Enabled Services*, WC Docket No. 04-36

Dear Ms. Dortch:

As a follow-up to our ex parte letter of April 12, 2005, Qwest would like to reaffirm that its current E911 service is available today through retail tariffs in all 14 of our states and is offered to end users including VoIP providers. These tariffs enable the VoIP provider to offer E911 services appropriately to its customers in a stationary mode. Stationary mode requires that the customer's telephone number is native to the rate center where the customer is physically located within the Qwest region. With regards to the nomadic mode, Qwest's tariffs, in conjunction with a VoIP provider purchasing connectivity to the VoIP Positioning Center ("VPC") will effectively activate the nomadic feature functionality. The nomadic mode enables the customer to predetermine a set of fixed addresses in different locations in which the customer's E911 calls would effectively route to the correct PSAP.

With regards to the effective implementation of E911 for VoIP services, Qwest proposes a phased implementation as follows:

Phase I – would be effective the date an FCC Order becomes effective. All VoIP providers would direct 100 percent of 911 calls placed from their VoIP end users (consumer and business) to the correct PSAP. This can be accomplished in one of two ways: purchase of the PS/ALI or similar service and/or purchase of 911 trunks. With a PS/ALI-type service, the 911 call is routed to the correct PSAP and the PSAP is also provided with the call-back number as well as the physical location of the calling party.[1] This 911 service can only be supported if the telephone number is native to the rate center. If the telephone number is not native to the rate center, then all calls are routed to the correct PSAP, but no call-back or location information is provided. If

[1] If the end user is served off an IP-PBX then, the location and number of the main PBX would be provided.

an end user takes the VoIP phone to a different location, then the end user must provide the VoIP provider with the new, correct location information and it will take approximately 72 hours for that information to be populated in the ALI database.

Phase II – would be effective within 18 months after the effective date of an FCC Order. All 911 VoIP-originated calls would be routed to the correct PSAP and the correct call-back number and physical location would be displayed at the PSAP call answering location. This Phase would require a VoIP provider to purchase trunks to connect to a VPC platform. In addition, the end user would need to update the physical location anytime the VoIP phone moved from one physical address to another. In this phase, however, the update to the ALI database would be dynamically processed (vs. 72 hours).

Phase III – There is no set implementation timeline. The goal at the end of this phase would be for a VoIP end user's 911 call to be routed to the correct PSAP and for the correct address and call-back number to be dynamically updated without any action on behalf of the end user. This effort will take the on-going effort of the entire industry and the FCC could require periodic reports from a standards body, e.g., NENA, on the status of this phase.

In accordance with Commission Rule 1.49(f), this *ex parte* letter is being filed electronically *via* the Commission's Electronic Comment Filing System for inclusion in the public record of the above-referenced docket pursuant to Commission Rule 1.1206(b)(2).

Sincerely,
/s/ Cronan O'Connell

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